

June 01, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

UNITED STATES OF AMERICA

v.

PATRICIA PINTO
AKA: Kimberly Moore
AKA: Imelda Martinez
AKA: Cecilia Bucio

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CRIMINAL NO. 5:22-CR-00467-S

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on or about **October 1, 2019, and continuing through on or about June 1, 2022**, in the Southern District of Texas, and within the jurisdiction of the Court, Defendant,

PATRICIA PINTO
AKA: Kimberly Moore
AKA: Imelda Martinez
AKA: Cecilia Bucio,

did knowingly conspire and agree with other persons known and unknown to the Grand Jurors to commit the following offenses against the United States:

- a) To import 1000 kilograms and more of a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 963, 952(a), and 960(a)(1) and (b)(1)(G).
- b) To possess with intent to distribute a Schedule I controlled substance, to wit, 1000 kilograms and more of a mixture or substance containing a detectable amount of marihuana, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vii), and 846.

COUNT TWO

On or about **December 20, 2019**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

PATRICIA PINTO
AKA: Kimberly Moore
AKA: Imelda Martinez
AKA: Cecilia Bucio,

did knowingly possess with the intent to distribute a controlled substance. This violation involved a quantity of 100 kilograms and more of a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii) and Title 18, United States Code, Section 2.

COUNT THREE

On or about **December 8, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

PATRICIA PINTO
AKA: Kimberly Moore
AKA: Imelda Martinez
AKA: Cecilia Bucio,

did knowingly import into the United States of America from the United Mexican States a controlled substance. This violation involved a quantity of 1000 kilograms and more of a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1) and (b)(1)(G), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREMAN OF THE GRAND JURY

JENNIFER B. LOWERY
UNITED STATES ATTORNEY



Gerard A. Cantu
Assistant United States Attorney

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET

LAREDO DIVISION

FILE: 21-03105

SUPERSEDING INDICTMENT

Filed: June 1, 2022

NO.5:22-CR-467-S

Judge: Diana Saldana

ATTORNEYS:

UNITED STATES OF AMERICA

VS.

JENNIFER B. LOWERY, USA
GERARD CANTU, AUSA

PATRICIA PINTO
A/K/A KIMBERLEY MOORE
A/K/A IMELDA MARTINEZ
A/K/A CECILIA BUCIO

CHARGES: Ct. 1: Conspiracy to possess with intent to distribute 1000 kilograms and more of marihuana [21 USC 846, 841(a)(1), 841(b)(1)(A)(vii)] and to import 1000 kilograms and more of marihuana[21 USC 963, 952(a) and 960(a)(1) and (b)(1)(G)]

Ct. 2: Possession with intent to distribute 100 kilograms and more of marihuana [21 USC 841(a)(1), 841(b)(1)(B)(vii) and 18 USC 2]

Ct. 3: Importation of 1000 kilograms ad more of marihuana [21 USC 952(a), 960(a)(1) and (b)(1)(G) and 18 USC 2]

TOTAL COUNTS: 3

PENALTY:

Cts. 1, 3: 10 years imprisonment and not more than life, not more than a \$10,000,000 fine, \$100 special assessment, at least 5 years up to a life term of supervised release.

Cts. 2: 5 to 40 years imprisonment, not more than a \$5,000,000 fine, \$100 special assessment, at least 3 years up to a lifeterm of supervised release.